

THE HONORABLE JAMES ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BRADY EDMONDS, on behalf of himself and
those similarly situated,

NO. 2:19-cv-01613-JLR

Plaintiffs,

**DECLARATION OF TOBY J. MARSHALL
ATTACHING CONSENT TO JOIN LAWSUIT**

vs.

AMAZON.COM, INC., a Foreign for Profit
Corporation; AMAZON LOGISTICS, INC., a
Foreign for Profit Corporation; AMAZON.COM
SERVICES, INC., a Foreign for Profit Corporation,

Defendants.

I, Toby J. Marshall, hereby declare as follows:

1. I am a member of Terrell Marshall Law Group PLLC ("TMLG") and one of the attorneys representing Plaintiff in the above-captioned matter. I make this declaration based on personal knowledge, and I am competent to testify regarding the following facts.

2. Attached hereto as Exhibit A are true and correct copies of Consent to Join FLSA Lawsuit forms that Plaintiffs' counsel received from the following individuals:

Vivek Danielson	Sarah Washington
Rickisha Anderson	Carlos Gonzalez
Biaggio Grooso	Knigyl Barner
Robert Garcia	

1 I declare under penalty of perjury under the laws of the United States and the state of
2 Washington that the foregoing is true and correct.

3 EXECUTED at Seattle, Washington this 17th day of October, 2019.

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5 By: /s/ Toby J. Marshall, WSBA #32726
6 Toby J. Marshall, WSBA #32726
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- Exhibit A -

CONSENT TO JOIN COLLECTIVE ACTION AND BE REPRESENTED BY
MORGAN AND MORGAN P.A.

- I, Vivek Danielson, worked as a driver delivering Amazon packages during the period from [CLASS START] to the present, and I was paid on a flat-rate basis;
- I consent to join the lawsuit brought against the Amazon Defendants in which it is alleged that Amazon jointly employed the drivers of delivery service providers and seeking damages for unpaid wages under the FLSA, as is reflected by the Complaint;
- I authorize the named Plaintiff to file and prosecute the above referenced matter in my name, and on my behalf, and designate the named Plaintiff to make decisions on my behalf concerning the litigation, including negotiating a resolution of my claims, and understand I will be bound by such decisions;
- I agree to be represented by Morgan and Morgan, counsel for the named Plaintiff, and any firms with which Morgan and Morgan chooses to associate;
- In the event this action gets conditionally certified and then decertified, or for any reason does not proceed as a collective action, or my individual claim is dismissed without prejudice, I authorize Plaintiff's counsel to reuse this Consent Form to re-file my claims in a separate or related action against Defendants if necessary.

Date: Oct 4, 2019

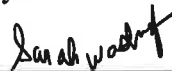
Signature:  Vivek Danielson (Oct 4, 2019)

Address: c/o Morgan and Morgan P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Fax: (954) 333-3515

CONSENT TO JOIN COLLECTIVE ACTION AND BE REPRESENTED BY
MORGAN AND MORGAN P.A.

- I, Sarah Washington, consent to join the lawsuit seeking damages for unpaid wages against Defendant(s) under the FLSA, as is reflected by the Complaint filed on my behalf;
- I am similarly situated to the named Plaintiffs in this matter because I performed similar duties for the Defendant(s) and was paid in the same regard as the named Plaintiff;
- I authorize the named Plaintiff to file and prosecute the above referenced matter in my name, and on my behalf, and designate the named Plaintiff to make decisions on my behalf concerning the litigations, including negotiating a resolution of my claims, and understand I will be bound by such decisions;
- I agree to be represented by Morgan and Morgan, counsel for the named Plaintiff;
- In the event this action gets conditionally certified and then decertified, or for any reason does not proceed as a collective action, or my individual claim is dismissed without prejudice, I authorize Plaintiffs' counsel to reuse this Consent Form to re-file my claims in a separate or related action against Defendant(s) if necessary.

Date: Oct 7, 2019

Signature:  sarah washington (Oct 7, 2019)

Address: c/o Morgan and Morgan P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Fax: (954) 327-3017

CONSENT TO JOIN COLLECTIVE ACTION AND BE REPRESENTED BY
MORGAN AND MORGAN P.A.

- I, Rickisha Anderson, consent to join the lawsuit seeking damages for unpaid wages against Defendant(s) under the FLSA, as is reflected by the Complaint filed on my behalf;
- I am similarly situated to the named Plaintiffs in this matter because I performed similar duties for the Defendant(s) and was paid in the same regard as the named Plaintiff;
- I authorize the named Plaintiff to file and prosecute the above referenced matter in my name, and on my behalf, and designate the named Plaintiff to make decisions on my behalf concerning the litigations, including negotiating a resolution of my claims, and understand I will be bound by such decisions;
- I agree to be represented by Morgan and Morgan, counsel for the named Plaintiff;
- In the event this action gets conditionally certified and then decertified, or for any reason does not proceed as a collective action, or my individual claim is dismissed without prejudice, I authorize Plaintiffs' counsel to reuse this Consent Form to re-file my claims in a separate or related action against Defendant(s) if necessary.

Date: Sep 19, 2019

Signature: *Rickisha Anderson*
Rickisha Anderson (Sep 19, 2019)

Address: c/o Morgan and Morgan P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Fax: (954) 327-3017

CONSENT TO JOIN COLLECTIVE ACTION AND BE REPRESENTED BY
MORGAN AND MORGAN P.A.

- I, Carlos Gonzalez, consent to join the lawsuit seeking damages for unpaid wages against Defendant(s) under the FLSA, as is reflected by the Complaint filed on my behalf;
- I am similarly situated to the named Plaintiffs in this matter because I performed similar duties for the Defendant(s) and was paid in the same regard as the named Plaintiff;
- I authorize the named Plaintiff to file and prosecute the above referenced matter in my name, and on my behalf, and designate the named Plaintiff to make decisions on my behalf concerning the litigations, including negotiating a resolution of my claims, and understand I will be bound by such decisions;
- I agree to be represented by Morgan and Morgan, counsel for the named Plaintiff;
- In the event this action gets conditionally certified and then decertified, or for any reason does not proceed as a collective action, or my individual claim is dismissed without prejudice, I authorize Plaintiffs' counsel to reuse this Consent Form to re-file my claims in a separate or related action against Defendant(s) if necessary.

Date: Sep 18, 2019

Signature: *Carlos Gonzalez*
Carlos Gonzalez (Sep 18, 2019)

Address: c/o Morgan and Morgan P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Fax: (954) 327-3017

CONSENT TO JOIN COLLECTIVE ACTION AND BE REPRESENTED BY
MORGAN AND MORGAN P.A.

- I, Biaggio Grosso, consent to join the lawsuit seeking damages for unpaid wages against Defendant(s) under the FLSA, as is reflected by the Complaint filed on my behalf;
- I am similarly situated to the named Plaintiffs in this matter because I performed similar duties for the Defendant(s) and was paid in the same regard as the named Plaintiff;
- I authorize the named Plaintiff to file and prosecute the above referenced matter in my name, and on my behalf, and designate the named Plaintiff to make decisions on my behalf concerning the litigations, including negotiating a resolution of my claims, and understand I will be bound by such decisions;
- I agree to be represented by Morgan and Morgan, counsel for the named Plaintiff;
- In the event this action gets conditionally certified and then decertified, or for any reason does not proceed as a collective action, or my individual claim is dismissed without prejudice, I authorize Plaintiffs' counsel to reuse this Consent Form to re-file my claims in a separate or related action against Defendant(s) if necessary.

Date: Sep 18, 2019

Signature:  Biaggio Grosso (Sep 18, 2019)

Address: c/o Morgan and Morgan P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Fax: (954) 327-3017

CONSENT TO JOIN COLLECTIVE ACTION AND BE REPRESENTED BY
MORGAN AND MORGAN P.A.

- I, Knigyl Barnes, consent to join the lawsuit seeking damages for unpaid wages against Defendant(s) under the FLSA, as is reflected by the Complaint filed on my behalf;
- I am similarly situated to the named Plaintiffs in this matter because I performed similar duties for the Defendant(s) and was paid in the same regard as the named Plaintiff;
- I authorize the named Plaintiff to file and prosecute the above referenced matter in my name, and on my behalf, and designate the named Plaintiff to make decisions on my behalf concerning the litigations, including negotiating a resolution of my claims, and understand I will be bound by such decisions;
- I agree to be represented by Morgan and Morgan, counsel for the named Plaintiff;
- In the event this action gets conditionally certified and then decertified, or for any reason does not proceed as a collective action, or my individual claim is dismissed without prejudice, I authorize Plaintiffs' counsel to reuse this Consent Form to re-file my claims in a separate or related action against Defendant(s) if necessary.

Date: Sep 18, 2019

Signature: *Knigyl Barnes*

Address: c/o Morgan and Morgan P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Fax: (954) 327-3017

CONSENT TO JOIN COLLECTIVE ACTION AND BE REPRESENTED BY
MORGAN AND MORGAN P.A.

- I, Roberto Garcia, consent to join the lawsuit seeking damages for unpaid wages against Defendant(s) under the FLSA, as is reflected by the Complaint filed on my behalf;
- I am similarly situated to the named Plaintiffs in this matter because I performed similar duties for the Defendant(s) and was paid in the same regard as the named Plaintiff;
- I authorize the named Plaintiff to file and prosecute the above referenced matter in my name, and on my behalf, and designate the named Plaintiff to make decisions on my behalf concerning the litigations, including negotiating a resolution of my claims, and understand I will be bound by such decisions;
- I agree to be represented by Morgan and Morgan, counsel for the named Plaintiff;
- In the event this action gets conditionally certified and then decertified, or for any reason does not proceed as a collective action, or my individual claim is dismissed without prejudice, I authorize Plaintiffs' counsel to reuse this Consent Form to re-file my claims in a separate or related action against Defendant(s) if necessary.

Date: Sep 19, 2019

Signature:  Roberto J Garcia (Sep 19, 2019)

Address: c/o Morgan and Morgan P.A.
8151 Peters Road, Suite 4000
Plantation, Florida 33324
Fax: (954) 327-3017